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10 IN THE UNITED STATES DISTRICT COURT
10 FOR THE DISTRICT OF OREGON
11 EUGENE DIVISION

12 UNITED STATES OF AMERICA,)
13 Plaintiff,)
14 vs.) Case No.: 6:17-CR-00455-AA
15 RICHARD MACADANGDANG SALES,)
16 Defendant.) DEFENDANT'S MOTION TO MODIFY
17) THE TERMS OF RELEASE

18 The Defendant, Richard Macadangdang Sales, through counsel, Bradley A. Cascagnette,
19 moves for an order modifying the terms of his release agreement to allow the removal of the
20 Electronic Monitoring Device.

21 Attached hereto and incorporated by reference is a declaration of counsel.

22 RESPECTFULLY SUBMITTED: August 15, 2018.

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Bradley A. Cascagnette, OSB 022686
Attorney for Defendant

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